

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-327-C**

IN RE: Continued Availability of Unbundled)
High Capacity Loops at Certain Locations and)
Unbundled High Capacity Transport on Certain)
Routes Pursuant to the Federal Communication)
Commission's Triennial Review Order)
_____)

**NUVOX COMMUNICATIONS, INC. RESPONSE TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S
REQUESTS FOR ADMISSIONS, INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

NuVox Communications, Inc. ("NuVox") hereby responds to BellSouth Telecommunications, Inc.'s ("BellSouth") discovery as follows:

REQUESTS FOR ADMISSIONS AND INTERROGATORIES

1. Please admit that NuVox has self-reported in CLONES (Central Location Online Entry System) database from Telecordia or to other third parties that it has deployed high capacity loop facilities to the following addresses:

3955 Faber Place Dr

North Charleston SC

TRIVERGENT
COMMUNICATIONS

RESPONSE: Denied. To the best of its knowledge and belief, NuVox has not self-reported in CLONES that it has deployed high capacity loop facilities to the address listed in the confidential attachment. NuVox is not a subscriber to this database and does not have access to any of its data. NuVox has no knowledge of the information contained in this database or the methods Telecordia uses to collect whatever data may be contained therein. NuVox cannot confirm, and therefore denies, BellSouth's assertion that the CLONES database contains information

indicating that NuVox has self-deployed high capacity loop facilities to specific customer locations.

2. Please admit that NuVox has deployed high capacity loop facilities to the following addresses:

3955 Faber Place Dr

North Charleston SC

TRIVERGENT
COMMUNICATIONS

RESPONSE: Denied. The location listed in the attachment is the address of NuVox's point of presence ("POP"). NuVox has leased a network facility from BellSouth to this POP. Therefore, the facility constitutes an entrance facility as defined in the TRO. All loops as defined by the TRO are between the CLEC and the customer/end user. All loops that were provisioned from this POP to the customer were leased from BellSouth.

3. Please admit that NuVox has deployed high capacity transport facilities to each of the central offices (identified by CLLI codes) listed below:

SC

NUVOX COMMUNICATIONS

CLMASCNS

RESPONSE: Denied: NuVox has leased from BellSouth to this location, network facilities to connect with the Greenville switch. The facilities are not "self-provisioned" and have no relevance to the TRO triggers. Because these facilities connect to NuVox's switch (i.e., to a point outside the BellSouth network), they constitute entrance facilities as defined in the TRO, not transport.

4. Please admit that NuVox can route or transport traffic using NuVox's own facilities between any pair of central offices to which it has deployed high capacity transport facilities. This includes routing or transporting traffic directly between the central offices or indirectly through an intermediate aggregation point, such as NuVox's switch or the switch of another CLEC.

RESPONSE: Denied. NuVox does not have its own facilities. All facilities are leased to network collocations with the Greenville switch. Because these facilities connect to NuVox's switch (i.e., to a point outside of BellSouth's network), they constitute entrance facilities as defined in the TRO, not transport. Moreover, it is incorrect to assume that there is transmission connectivity between any pair of central offices that are independently connected to a CLEC switch. Once traffic hits the CLEC switch, the traffic is routed based on the destination on the PSTN of the called party.

5. Please admit that NuVox has fiber based collocation arrangements at the central offices (identified by CLLI code) listed below:

SC	NUVOX COMMUNICATIONS	CLMASCSN
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RESPONSE: Denied. Currently NuVox does not have a fiber-based collocation at the above CLLI.

6. If NuVox has denied any of the previous Requests for Admissions, state all facts and identify all documents that support such denial.

RESPONSE: See Responses to Request for Admissions and Interrogatories Nos. 1-5, above. No such documents exist.

7. If NuVox has admitted any portion of Request for Admission 4, please describe with particularity the nodes or termination points along the route.

RESPONSE: Not applicable.

8. If NuVox has deployed any high capacity loop facilities in any of the Southeastern states, please provide the percentage of buildings where NuVox installed its own inside wiring, the percentage of buildings where NuVox is leasing inside wiring from another carrier, including the ILEC, and the percentage of buildings where NuVox is using inside wiring owned by the

building owner. In each of these situations, please describe with specificity the cost paid for installing or leasing the inside wire in buildings.

RESPONSE: NuVox does not lease or install inside wiring. NuVox provides service up to the DEMARC; all wiring within the customer's premise must be provided by the customer.

REQUESTS FOR PRODUCTION

1. Produce any documents identified above.

RESPONSE: None.

Respectfully submitted this 27th day of February 2004.

/S/

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing NuVox Communication, Inc. Response to BellSouth Telecommunications, Inc.'s Requests for Admissions, Interrogatories and Request for Production of Documents dated February 27, 2004, has been served upon the following counsel of record by forwarding same to each via email as shown below this 27th day of February, 2004.

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/S/

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